

Holland & Knight LLP
 50 California Street, 28th Floor
 San Francisco, CA 94111
 Tel: (415) 743-6900
 Fax: (415) 743-6910

Richard T. Williams (State Bar No. 52896)
 Tara L. Cooper (State Bar No. 239018)
 HOLLAND & KNIGHT LLP
 633 West Fifth Street, 21st Floor
 Los Angeles, California 90071-2040
 Telephone (213) 896-2400
 Facsimile (213) 896-2450
 E-mail: tara.cooper@hkllaw.com

David M. Gonden (State Bar No. 154306)
 HOLLAND & KNIGHT LLP
 50 California Street, #2800
 San Francisco, California 94111
 Telephone (415) 743-6900
 Facsimile (415) 743-6915
 E-mail: david.gonden@hkllaw.com

Attorneys for Defendant
 Ritz Camera Centers, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

SHOGHER ANDONIAN, on behalf of
 himself and all others similarly situated,

Plaintiff,

vs.

RITZ CAMERA CENTERS, INC.,

Defendant.

CIVIL ACTION NO. C07-06342 SBA

CONSOLIDATED WITH

CIVIL ACTION NO. C 07-0716 SBA

(Zachary Hile v. Ritz Camera Centers, Inc.)

NOTICE OF PROPOSED CLASS

ACTION SETTLEMENT AND

COMPLIANCE WITH ADR ORDER

[15 U.S.C. §§ 1681c(g)]

CLASS ACTION

TO THE ADR ADMINISTRATOR AND ALL PARTIES HEREIN:

Notice is hereby given that the parties to the above entitled cases have reached a settlement of the above referenced matters. The settlement was obtained as the result of private mediation and

1 the parties' negotiations and is contingent upon the Court's approval of the plaintiffs' motion for
2 preliminary approval of the class action settlement, filed on April 21, 2008, a copy of which is
3 attached as Exhibit A.

4 Respectfully Submitted

5
6 Dated: April 23, 2008

HOLLAND & KNIGHT LLP

7
8 
9 David M. Gonden

10 Attorneys for Ritz Camera Centers, Inc.

11 # 5290113_v1

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Holland & Knight LLP
50 California Street, 28th Floor
San Francisco, CA 94111
Tel: (415) 743-6900
Fax: (415) 743-6910

EXHIBIT "A"

Eric A. Grover (SBN 136080)
KELLER GROVER LLP
425 Second Street, Suite 500
San Francisco, CA 94107
Telephone: (415) 543-1305
Facsimile: (415) 543-7861
eagrover@kellergrover.com

Attorneys for Plaintiff Zachary Hile

William A. Baird (SBN 192675)
Launa N. Everman (SBN 227743)
MILSTEIN, ADELMAN & KREGER, LLP
2800 Donald Douglas Loop North
Santa Monica, California 90405
Telephone: (310) 396-9600
Facsimile: (310) 396-9635
tbaird@maklawyers.com

Attorneys for Plaintiff Shogher Andonian

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ZACHARY HILE, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

RITZ CAMERA CENTERS, INC.,

Defendant.

SHOGHER ANDONIAN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

RITZ CAMERA CENTERS, INC., a
Delaware corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No.: CV-07-00716 SBA

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 3, 2008

Time: 1:00 PM

Ctrm: 3, 3rd Floor

Hon. Sandra B. Armstrong

1 Please take notice that on June 3, 2008 at 1:00 p.m., or as soon thereafter as counsel may
2 be heard, in Courtroom 3 on the 3rd Floor of the United States District Courthouse, located at
3 1301 Clay Street, Oakland, California, plaintiffs Zachary Hile and Shogher Andonian
4 ("Plaintiffs") will and hereby do move for preliminary approval of the Stipulation of Settlement
5 (the "Settlement") reached between Plaintiffs and defendant Ritz Camera Centers, Inc.
6 ("Defendant") filed concurrently herewith. Specifically, Plaintiffs move for an order:

7 (1) granting preliminarily approval of the terms of the Settlement, including the
8 amount of the settlement fund; the amount of distributions to the class; the procedure for giving
9 notice to class members; the procedure for opting out of the Settlement; the procedure for
10 submitting claims; and the amounts allocated to incentive payments, costs and attorneys' fees;

11 (2) certifying for settlement purposes the settlement class described in the Settlement
12 (the "Settlement Class");

13 (3) appointing Plaintiffs as class representatives for the Settlement Class;

14 (4) appointing Keller Grover LLP, Thierman Law Firm, Steven L. Miller, A
15 Professional Law Corporation, Scott A. Miller, A.P.C., and Milstein, Adelman & Kreger, LLP as
16 counsel for the Settlement Class;

17 (5) directing notice to members of the Settlement Class of their rights to opt out of
18 the Settlement as provided in the Settlement; and

19 (6) scheduling a hearing on the question of whether the Settlement should be finally
20 approved as fair, reasonable and adequate.

21 Plaintiffs' motion is based on this Notice; the Joint Stipulation of Class Action
22 Settlement; the Memorandum of Points and Authorities; the Declarations of Eric A. Grover,
23 William A. Baird, and Curtis Scheel filed concurrently herewith; other papers on file in this
24 action; and on any oral argument or other matters the Court may take into consideration when
25 ruling on the motion.

1 DATED: April 18, 2008

Respectfully Submitted,

3 /s/

4 Eric A. Grover
KELLER GROVER LLP

5 Mark R. Thierman
THIERMAN LAW FIRM
6 7287 Lakeside Drive
7 Reno, Nevada 89511
8 Tel. (775) 284-1500
9 Fax (775) 703-5027
laborlawyer@pacbell.net

10 Scott A. Miller
LAW OFFICES OF SCOTT A. MILLER, A.P.C.
11 16133 Ventura Blvd. Suite 1200
12 Encino, California 91436
13 Tel. (818) 788-8081
14 Fax (818) 788-8080
millaw@sbcglobal.net

15 Steven L. Miller
STEVEN L. MILLER, A PLC
16 16133 Ventura Blvd. Suite 1200
17 Encino, California 91436
18 Tel. (818) 986-8900
19 Fax (818) 990-7900
stevenlmiller@sbcglobal.net

20 Attorney for Plaintiff ZACHARY HILE

21 DATED: April 18, 2008

Respectfully Submitted,

22 /s/

23 William A. Baird
Launa N. Everman
MILSTEIN, ADELMAN & KREGER, LLP

24 Attorneys for Plaintiff SHOGHER ANDONIAN